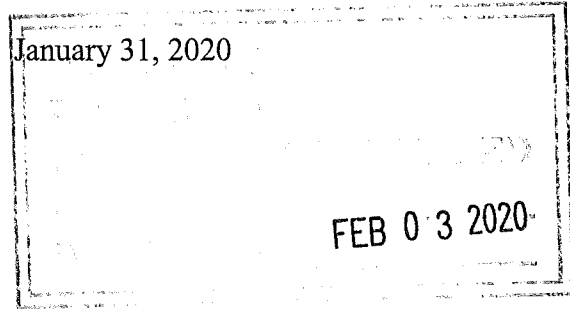


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**BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2102  
New York, NY 10007

RE *Innocence Project v. National Museum of Health and Medicine*, No. 19-cv-1574  
Letter motion to file documents under seal

Dear Judge Nathan,

Plaintiff submits this letter motion to file under seal certain documents in connection with the ongoing litigation regarding Plaintiff's request to lift existing non-disclosure obligations with respect to a particular document. *See* ECF Nos. 39, 42, 45, 51. In particular, we seek leave to file under seal Exhibit A to the Notice of Filing submitted to the Court today, as well as the Certificate of Service attesting that copies of today's filings have been sent by mail to the interested non-parties who do not receive service by ECF. Defendants take no position with respect to this motion.

SO ORDERED

Public filing of Exhibit A and the Certificate of Service would disclose the identities of the author and subject of the document in question. Whether that information can be publicly disclosed is the subject of the pending litigation. In order not to disclose that information prematurely, it is necessary to file these documents under seal.

Once the Court has resolved whether and to what extent the information in question is subject to a continuing non-disclosure obligation, Plaintiff will file copies of the sealed documents on the public docket via ECF, as appropriate, in a manner consistent with the Court's ruling and its individual rules of practice. *See* Hon. Alison J. Nathan, U.S.D.J., Individual Practice in Civil Cases § 4.B. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/Jonathan Manes  
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*Counsel for Plaintiff*

SO ORDERED: 2/3/20

HON. ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE